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Presentment Date: November 16, 2015 at 12:00 PM
Objection Date: November 13, 2015

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-1789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC

Plaintiff,

v.

DEFENDANTS LISTED ON APPENDIX A
ATTACHED TO THE ACCOMPANYING
PROPOSED FORM OF ORDER,

Defendants.

Adv. Pro. Nos. listed on Appendix A
Attached to the Accompanying
Proposed Form of Order

**NOTICE OF PRESENTMENT OF AN ORDER
GRANTING APPLICATION TO WITHDRAW AS COUNSEL**

PLEASE TAKE NOTICE that, upon the annexed Declaration of Julie Gorchkova in
Support of Application for an Order to Withdraw as Counsel, dated November 6, 2015, Becker

& Poliakoff LLP, through its attorneys, attorneys of record for the Defendants listed on Appendix A attached to the accompanying Proposed Form of Order (the “Defendants”), will present the attached proposed order to the Honorable Stuart M. Bernstein, United States Bankruptcy Judge at the United States Bankruptcy Court for the Southern District of New York at One Bowling Green, New York, NY 10004, for signature on November 16, 2015 at 12:00 noon.

PLEASE TAKE FURTHER NOTICE that unless a written objection to the proposed order, with proof of service, is filed with the Clerk of the Court and copies of such objection are served so as to be delivered to the undersigned, along with counsel to the Trustee, and a courtesy copy is delivered to the Bankruptcy Judge's chambers at least three days before the date of presentment, there will not be a hearing and the order may be signed.

PLEASE TAKE FURTHER NOTICE that if a written objection is timely filed, the Court will notify the moving and objecting parties of the date and time of the hearing and of the moving party's obligation to notify all other parties entitled to receive notice. The moving and objecting parties are required to attend the hearing, and failure to attend in person or by counsel may result in relief being granted or denied upon default.

Dated: November 6, 2015
New York, New York

BECKER & POLIAKOFF LLP

By: /s/ Julie Gorchkova
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*Attorneys for Defendants listed on
Appendix A*